



Max D. Stern
Jonathan Shapiro
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January 20, 2005

S. Faqar Hasib
Assistant U.S. Attorney
United States Courthouse
Suite 9200
1 Courthouse Way
Boston, MA 02210

Re: United States v. Joseph Matz
No. 04CR10332-RCL

Dear Faqar:

I am writing to you pursuant to L.R. 116.3 to request further discovery in the above case as follows:

1. I have information that defendant was interrogated by FBI agents in connection with this case on or about November, 1999, when he was arrested in New York City and on or about March 2003, when he was incarcerated at Souza Baranouski Correctional Center in Shirley, Massachusetts. Please provide me with any and all reports of these (or any other interrogations) pursuant to L.R. 116.1(C).

2. Please provide me with any and all documents which relate in any way to the delay in indicting defendant for the Federal Street bank robbery and the reasons for the delay. I believe that the FBI had information that defendant was the perpetrator of the Federal Street robbery at or about the same time that he was prosecuted by state authorities in Springfield, Massachusetts, and Hartford, Connecticut, but chose not to bring federal charges.

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3. Please provide me with the discovery required by Rule 16(a)(1)(G) with respect to the government's fingerprint expert. In addition, please provide me with copies of the latent prints that have been identified as defendant's as well as any and all documents generated by the expert which explain or demonstrate his conclusion that the prints are of defendant.

4. Please provide me with the names and addresses of all witnesses to the bank robbery, including those witnesses who provided descriptions of the robber.

5. Please provide me with notice of any other crimes or misconduct evidence that the government will seek to introduce at trial under Fed.R.Evid. 404(b).

6. Please provide me with all evidence in the possession, custody or control of the government relating to the robbery by defendant of a bank in Springfield, MA on or about 11/5/99, and of a bank in Hartford, CT, on or about 11/18/99.

Thank you for your attention to this matter.

Very truly yours,

/s/ Jonathan Shapiro
Jonathan Shapiro

JS/jah
cc: Mr. Joseph Matz